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July 24, 2020

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: USA v. Walters Case No. 1:16-cr-00338 (PKC)

Dear Judge Castel:

The Court has set oral argument on the matter of restitution in the above-styled case for July 30. As we previously reported to the Court, Dean Foods and Walters engaged in a dialogue to resolve the matter within its Chapter 11 bankruptcy proceedings pending in the Southern District of Texas. While final settlement documents have not been executed, the parties have an agreement in principle that will request that the Court enter the original restitution amount of \$8.8 million.

Walters respectfully requests that the Court grant another extension of 60 days for the scheduled hearing. As the Court is aware, any agreement between Dean Foods and Walters will need to be approved by the bankruptcy court. We do not anticipate any issues with the bankruptcy court as the plan for entry of the original restitution amount has been approved by all necessary stakeholders in the bankruptcy case, including the unsecured creditors committee.

Walters and Dean Foods have worked collaboratively to come to the agreed framework and we are optimistic that the collaborative effort will move the remaining issues to a speedy resolution in the bankruptcy court.

Hon. P. Kevin Castel
USA v. Walters Case No. 1:16-cr-00338 (PKC)
July 24, 2020
Page 2 of 2

Accordingly, in the interest of preserving the resources of the bankruptcy estate and the Court, we request that the Court reschedule the restitution hearing for 60 days. We have consulted with the Government which consents to the request for adjournment.

Very truly yours,



Gregory A. Brassfield

cc: **VIA ECF**
Margaret Graham
United States Department of Justice

Paul Schoeman
Attorney for William T. Walters